

## REMARKS

The method claims have been amended to express the particular kind of PICM being sensed in order to distinguish from the pyroelectric response measured in the Clarke et al. reference. The method claims now require that the photo-induced charge movements consist of isometric change or the ejection of electrons, protons or OH<sup>-</sup> ions, thereby precluding sensing of pyroelectric effects. Because of this limitation, the methodology of Clarke et al. does not anticipate or make obvious the method claims as presented.

In the apparatus claims, the language has been amended to better express that the dye is adsorbed on the membrane itself. As previously argued, all prior arguments being incorporated by reference herein, Clarke et al. has a dye adhered to the electrode itself. Because of this limitation, the apparatus of Clarke et al. does not anticipate nor make obvious the apparatus as presented, as the apparatus of Clarke et al. would not function if the dye was adhered to the membrane and therefore there is no motivation or suggestion in Clarke et al. to alter the apparatus in such manner.

It is respectfully submitted that the claims as amended are patentable, on the basis of the above remarks, and reconsideration and subsequent passage for allowance is hereby requested.

Respectfully submitted,



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